

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA (PHILADELPHIA)**

UNITED STATES OF AMERICA,

CASE NO. 2:23-cr-00016-JLS

vs.

BHASKAR SAVANI, ET AL.;

Defendants.

**DEFENDANT ARUN SAVANI'S MOTION FOR MODIFICATION OF HIS CURRENT
CONDITIONS OF PRETRIAL RELEASE**

Defendant Arun Savani ("Mr. Savani"), by and through undersigned counsel, hereby moves this Court for an order allowing Mr. Savani to attend his niece's housewarming party in Nescopeck, Pennsylvania, which is located in Luzerne County, on June 22, 2024. Luzerne County is located in the Middle District of Pennsylvania. In support of this Motion, Mr. Savani states as follows:

1. On January 23, 2023, the Court entered its Conditions of Release Order, which required Mr. Savani to submit to location monitoring. (*See* Conditions of Release Order at 1, ECF No. 54.) The Order also restricted Mr. Savani to home detention, except for certain activities, "approved in advance by the pretrial services office or supervising officer." (*Id.* at 2.) The limited travel allowed was restricted to the Eastern District of Pennsylvania unless prior permission was granted by the U.S. Pretrial Services. (*Id.*)

2. On February 27, 2023, the Court entered an Order modifying its prior Conditions of Release Order. (Order, ECF No. 169.) The Court imposed a curfew upon Mr. Savani, but only from 10:00 p.m. to 7:00 a.m., thus "permitt[ing him] to move within the Eastern District of Pennsylvania between the hours of 7:00 a.m. and 10:00 p.m." (Order at 1, ECF No. 169.) All

other conditions related to Mr. Savani's travel that were previously imposed by the Court remained in effect. (*Id.* at 2.)

3. While the terms detailed in the original Conditions of Release Order provided that Mr. Savani may travel outside the Eastern District of Pennsylvania with prior permission granted by the U.S. Pretrial Services, the U.S. Pretrial Services is hesitant to grant permission without a more explicit Order from this Court.

4. Since the Indictment in this case was returned, Mr. Savani has abided by all the Court's conditions of release. He is a long-time United States citizen with rock-solid ties to the community.

5. Mr. Savani requests to attend his niece's housewarming party on June 22, 2024. Her home is located at 215 Church Road, Nescopeck, Pennsylvania 18635, which is in Luzerne County. Luzerne County is located in the Middle District of Pennsylvania. The housewarming party is scheduled to take place from 3:00 p.m. to 7:30 p.m.

6. Mr. Savani pledges to abide by the Court's curfew and will return home in a timely manner on June 22, 2024. He will also travel to and from the housewarming party by car.

7. Mr. Savani's U.S. Pretrial Services Officer and AUSA Lesley Bonney have no objections to the modifications and travel specified within the instant Motion.

WHEREFORE, Mr. Savani requests that the Court grant his Motion for Modification of His Current Conditions of Pretrial Release and allow him to attend his niece's housewarming party in Nescopeck, Pennsylvania, which is located in Luzerne County, on June 22, 2024.

Dated: June 7, 2024

Respectfully Submitted,

/s/ Solomon L. Wisenberg
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Attorney for Defendant Arun Savani

CERTIFICATE OF SERVICE

The undersigned hereby certifies on the 7th day of June 2024, a true and correct copy of the foregoing Motion for Modification of His Current Conditions of Pretrial Release was filed electronically and served upon all counsel of record through the CM/ECF system.

/s/ Solomon L. Wisenberg
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